

TONY WEST
Assistant Attorney General
DAVID J. KLINE
Director, District Court Section
Office of Immigration Litigation
VICTOR M. LAWRENCE
Principal Assistant Director
SAMUEL P. GO, NYSBN 4234852
Trial Attorney

P.O. Box 868, Ben Franklin Station
Washington, D.C. 20044-0868
Telephone: (202) 353-9923; FAX: (202) 616-8962

Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JAY BAHADUR TAMANG,

Plaintiff,

v.

JANET NAPOLITANO, Secretary, Department of
Homeland Security; ERIC H. HOLDER, JR.,
Attorney General, United States Department of
Justice; ROBERT S. MUELLER, Director, Federal
Bureau of Investigation; MICHAEL AYTES,
Acting Deputy Director, United States Citizenship
and Immigration Services (USCIS); DAVID
ROARK, Director, Texas Service Center; and
ROSEMARY MELVILLE, District Director, San
Francisco Field Office, USCIS,

Defendants.

No. 3:09-cv-1490 (MEJ)

**STIPULATION TO EXTEND
DATES; AND ~~PROPOSED~~
ORDER**

Plaintiff, by and through their attorneys of record, and Defendants by and through their
attorneys of record, hereby stipulate, subject to the approval of the Court, to the following:

1. Plaintiff filed this action on or about April 6, 2009. Defendants' response is due on
June 12, 2009.

2. The parties believe this matter might resolve without further litigation.

3. Therefore, the parties hereby respectfully ask this Court to a 45-day extension of time within which the Defendants must serve its response in the above-entitled action. Defendants will file their response on or before July 27, 2009.

Dated: June 12, 2009

Respectfully submitted,

TONY WEST
Assistant Attorney General

DAVID J. KLINE
Director, District Court Section
Office of Immigration Litigation

VICTOR M. LAWRENCE
Principal Assistant Director

/s/ Samuel P. Go
SAMUEL P. GO
Trial Attorney, District Court Section
Office of Immigration Litigation
U.S. Department of Justice, Civil Division

Attorneys for Defendants

Date: June 12, 2009

/s/ Sara G. Noel (with permission)
SARA G. NOEL

Attorney for Plaintiffs

ORDER

Pursuant to stipulation, IT IS SO ORDERED.

Date: June 17, 2009


MARIA-ELAN JAMES
United States Magistrate Judge

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Stipulation to Extend Dates and [Proposed] Order was served via the district court's electronic filing system on this 12th day of June 2009 to the following counsel:

Reginald Steer
Sara G. Noel
AKIN GUMP STRAUSS HAUER & FELD LLP
580 California Street, Suite 1500
San Francisco, CA 94104

Theodore Roethke
ASIAN LAW CAUCUS
55 Columbus Avenue
San Francisco, CA 94111

/s/ Samuel P. Go
SAMUEL P. GO
U.S. DEPARTMENT OF JUSTICE